



U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

Subject: **ACTION:** AIR Procedures for Processing NTSB
Safety Recommendations

Date: JAN 13 1997

From: Director, Aircraft Certification Service, AIR-1

Reply to
Attn. of:

To: All Aircraft Certification Service Division Managers
All Aircraft Certification Service Directorate Managers
Manager, International Certification Staff
Manager, Brussels Aircraft Certification Staff

The attached document is intended to serve as a job aid for processing recommendations in the Aircraft Certification Service from the National Transportation Safety Board (NTSB).

In April 1996, an employee group of the Aircraft Certification Service met to discuss procedures for responding to recommendations from the NTSB. During this meeting, there were sharing of some ideas that emerged about improving quality and timeliness of the Service's response to the NTSB recommendations. These ideas form the core of the procedures presented in this document.

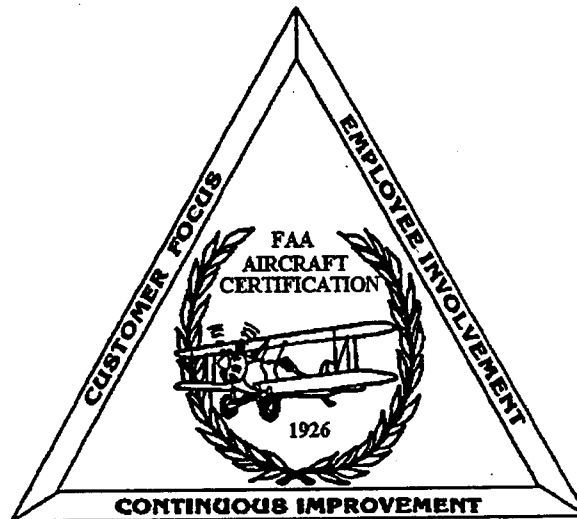
In the July 1996 meeting, the Aircraft Certification Management Team voted to adopt this document as a job aid for processing NTSB recommendations in the Service. I am requesting that this manual be put into practice on January 15, 1997.

for Elizabeth Yost
Thomas E. McSweeney

Attachment

Aircraft Certification Service Procedures for Processing National Transportation Safety Board Recommendations

**AIRCRAFT CERTIFICATION SERVICE
PROCEDURES FOR PROCESSING
NATIONAL TRANSPORTATION SAFETY BOARD
RECOMMENDATIONS**

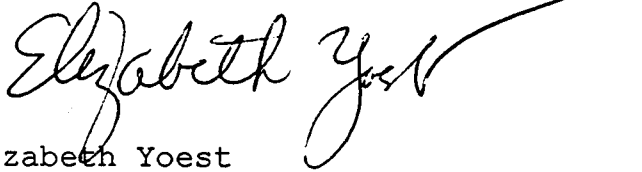


January 13, 1997

FAA-AIR-97-03

In April 1996, an employee group of the Aircraft Certification Service met to discuss procedures for responding to recommendations from the NTSB. During this meeting, there was sharing of some ideas that emerged about improving quality and timeliness of the Service's response to the NTSB recommendations. These ideas form the core of the procedures presented in this document.

In their July 1996 meeting, the Aircraft Certification Management Team voted to adopt this document as a job aid for processing NTSB recommendations in the Service.

A handwritten signature in cursive script, reading "Elizabeth Yoest". The signature is written in black ink and is positioned above the printed name and title.

Elizabeth Yoest
Acting Director, Aircraft
Certification Service, AIR-1

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- a. Investigate transportation accidents;
- b. Determine the probable cause of accidents;
- c. Make recommendations to the Secretary of Transportation or heads of Department of Transportation (DOT) operating administrations for preventing and investigating accidents, or for otherwise promoting safety; and
- d. Request assistance in its accident investigation functions from heads of the DOT operating administrations.

2. References. With respect to the authority cited in 1(c) above, the following directives have been issued:

a. The NTSB Order 82, National Transportation Safety Board Safety Recommendations, dated June 11, 1987, sets forth a number of policy considerations relating to the safety recommendation system. It also provides detailed information such as how recommendations are prioritized, notations used in documenting the implementation status of recommendations, etc.

b. Related DOT policy and implementing procedures are contained in DOT Order 2000.1D, Department of Transportation Procedures for Handling National Transportation Safety Board Recommendations, dated April 22, 1994.

c. The Federal Aviation Administration (FAA) implementing procedures are contained in FAA Order 1220.2F, FAA Procedures for Handling National Transportation Safety Board Recommendations, dated March 22, 1995.

3. Primary FAA Office for Coordination of NTSB Recommendations. The primary FAA staff office with respect to correspondence associated with NTSB safety recommendations is located in the FAA, Office of Accident Investigation, AAI-1.

recommendations to minimize the probability of such occurrences. This process consists of review and research, tests and analyses in industry laboratories, and public hearings.

2. The FAA assigns these recommendations a high priority; Senior officials are involved personally to ensure timely implementation of the Board's recommendations, and the FAA Office of Accident Investigation (AAI) is assigned the program management responsibility. In the area of aeronautical product design and manufacturing, the Aircraft Certification Service is the responsible office for implementing NTSB recommendations. To streamline the implementation of the safety recommendations, the Service has defined the following procedures:

a. The Aircraft Engineering Division, AIR-100, serving as a focal point for the Service, receives all incoming recommendations and assigns them to the appropriate AIR office for action. These action offices are: the Transport Airplane Directorate, ANM-100; Small Airplane Directorate, ACE-100; Engine and Propeller Directorate, ANE-100; Rotorcraft Directorate, ASW-100; Aircraft Engineering Division, AIR-100; and Production & Airworthiness Division, AIR-200.

b. Each Directorate/Division has designated an NTSB Safety Recommendations Coordinator who reviews and assigns the recommendations to the appropriate office for action.

c. The Action Office is responsible for drafting a response to the issues raised in the NTSB recommendation. The draft response should not only address the specific issues raised in the NTSB recommendation, but also offer an approach to ensure that the safety concerns are addressed as well. If an alternative action is proposed, or if the recommendation is rejected either in whole or in part, the Action Office shall provide sufficient detail to justify its position. Also, the Action Office should develop and maintain an NTSB recommendation tracking system in order to track the progress of the proposed action needed to address the safety recommendation. The Action Office forwards the proposed response and action plan containing significant milestones to the NTSB Coordinator in the Directorate/Division.

prepares an action plan that is consistent with and supports the proposed response. Also, the NTSB Coordinator develops and maintains an NTSB safety recommendation tracking system in order to track the progress of the proposed action needed to address the safety recommendation. In particular, in responding to recommendations where we propose alternate actions or disagree, the response must be reviewed by the Directorate/Division Managers or their Deputies. The Division/Directorate response to the NTSB is forwarded to AIR-120 for review. AIR-120 forwards the response to AIR-1/2 for review. The AIR response is then forwarded to AAI-210 for review, processing, and coordination.

managing, and tracking NTSB safety recommendations. Ensures compliance with FAA Order 1220.2F, FAA Procedures for Handling National Transportation Safety Board Recommendations, and the effective implementation of stated policy.

2. Assigns action for each NTSB safety recommendation to the office having primary subject matter responsibility.

3. Serves as the liaison between FAA and the NTSB on all NTSB safety recommendation issues.

4. Reviews and evaluates proposed responses to NTSB safety recommendations for adequacy, accuracy, and appropriateness in resolving the safety issues(s) addressed. Ensures that the agency's actions are consistent with previous FAA actions taken on similar matters.

5. Prepares initial FAA responses to NTSB safety recommendations for the Administrator's signature no later than 70 days after receipt of the recommendations.

6. Coordinates for review and comment all FAA responses to NTSB safety recommendations with all affected organizational elements.

7. Maintains a status log and file of all NTSB safety recommendations and correspondence.

8. Schedules and leads meetings with FAA program offices and the NTSB to discuss and resolve controversial NTSB recommendation issues.

1. Director/Deputy Director Aircraft Certification Service. Provides Service approval on all NTSB safety recommendations which involve changes to policy or high public interest.
2. Directorate/Division Manager. Reviews and evaluates proposed responses to NTSB safety recommendations for consistency with Service policy. Approves responses proposed by the Action Office. Takes effective steps to ensure approved action plans are implemented.
3. Manager, Technical Program and Continued Airworthiness Branch. Assigns action for each NTSB safety recommendation to the office having primary subject matter responsibility. Reviews and evaluates responses to the NTSB recommendations for technical accuracy. Reviews all responses and takes steps to ensure consistency with service policy.
4. Service Coordinator. Acts as liaison between the HQ Coordinator and AIR-1/2. Tracks recommendations forwarded to AIR-1/2 for coordination.
5. AIR Headquarters Coordinator (HQ). Serves as the focal point for receiving, reviewing, and coordinating NTSB Safety Recommendations assigned to the Aircraft Certification Service. The HQ coordinator is also responsible for processing, managing, and tracking NTSB safety recommendations and action plans assigned to AIR-100/200.
6. Action Office. Conducts a technical evaluation of each NTSB safety recommendation received to determine the feasibility of implementing the recommendation, and prepares a response to NTSB safety recommendations. The Action Office develops a plan to implement an approved course of action.

respond to the safety recommendation issue. If an NTSB safety recommendation is misrouted, notify the Technical Program and Continued Airworthiness Branch, AIR-120, and the Recommendation Branch, AAI-210, immediately.

2. Prepares proposed responses to NTSB safety recommendations. Submit memorandum with proposed initial responses to safety recommendations to the Technical Programs and Continued Airworthiness Branch, AIR-120, no later than 35 days after the receipt of the recommendations. Provide an anticipated completion date for all proposed actions in response to the NTSB safety recommendations.

3. Provides copies of all documents to support FAA's response to NTSB safety recommendations.

4. Ensures that proposed responses directly address the NTSB safety recommendation issues and that proposed responses clearly state the agency's proposed course of action to address the issues. If an alternative action is proposed or if the recommendation is rejected, either in whole or in part, provide justification for the agency's position.

5. Coordinates proposed actions to address NTSB safety recommendations with all other affected FAA elements prior to forwarding proposed response to the Technical Program and Continued Airworthiness Branch, AIR-120. Also, name, routing symbol, and phone number of person proposing action should be included in the cover memo.

6. Conducts periodic internal reviews of proposed actions in response to NTSB safety recommendations to ensure timely completion of stated actions. If major slippages are identified, notify the Technical Programs and Continued Airworthiness Branch, AIR-120, and the Recommendation Branch, AAI-210, immediately of revised completion dates.

7. Responds to all follow-up correspondence from the NTSB in a timely manner.

offices within the Directorate.

c. Identify and provide (by FAX and copy) the recommendation to the responsible Action Office and MIDO. Follow-up with the Action Office to provide response.

d. Prepare initial and subsequent responses with the Action Office input and send to AIR-120. Use the guidance provided in the checklist to prepare responses. Fully address all issues. Provide completion dates for all proposed actions. Provide documentation as it becomes available. Coordinate with and copy all affected FAA elements.

e. Maintain a log and monitor the initial and subsequent recommendation response due dates. Provide justification to AAI-200 with a copy to AIR-120 if final action dates cannot be met.

f. Develop an AIR NTSB Summary Report and cc:Mail to AIR-120 quarterly. The Report will serve as an AIR-1/2 reference document.

an action plan and any justification needed for alternate action.

3. The Action Office is responsible for drafting a response to the issues raised in the NTSB recommendation. The draft response should not only address the specific issues raised in the NTSB recommendation, but also offer an approach to ensure that the safety concerns are addressed as well. If an alternative action is proposed, or if the recommendation is rejected either in whole or in part, the Action Office shall provide sufficient detail to justify its position.

4. Prepare response to the recommendation.

5. Seek Division/Directorate approval.

6. Implement the approved action plan.

FAA RESPONSES - DEVELOPMENT AND REVIEW

Appendix 1 provides a checklist for preparing initial responses and follow-up letters. The checklist is to be submitted to the coordinator with each response to the Board.

RESPONSE FORMAT

Appendix 2 provides a sample format for preparing responses to AAI-210.

REPORTING REQUIREMENTS

AAI-210 provides each coordinator with a monthly status report of all Open NTSB safety recommendations for update and tracking purposes. Each coordinator shall submit a quarterly summary report of all Open NTSB safety recommendations to AIR-120 for internal use.

Recommendation Number: _____
Person Preparing Response: _____
Response Due Date: _____

Scoping Request (Check all applicable items)

_____ Understand recommendation (if not, seek clarification from AAI)
_____ Contact any other office (both inside and outside of AIR) which
_____ might have input to response
_____ Determine resources

Preparation of Response (Check all applicable items)

_____ Do we agree with Board's recommendation?
_____ If yes, explain fully in response
_____ If no, explain rationale for non-concurrence
_____ If alternate recommendation, explain why alternate
_____ proposal is better

_____ Set realistic milestones for implementation (best we can do?)
_____ Include milestone dates in response
_____ Indicate if long term study/research is required
_____ (over 6 months)
_____ Include interim actions if process will be lengthy
_____ and a safety issue exists

_____ Provide applicable documents (AD's, TSO's, reports, service
_____ bulletins, etc.)

_____ Indicate how intent of recommendation was met (use wording from
_____ recommendation)

_____ Do's and Don'ts
_____ Don't say action (i.e., NPRM) is being considered
_____ unless it really is
_____ Do coordinate with other offices which have input
_____ (AFS, AAT, etc.)
_____ Don't imply that FAA internal policies do not permit
_____ implementation
_____ Don't say problem is solved by previous action when
_____ problem still exists
_____ Do give full explanation of how a regulation covers
_____ the recommendation
_____ Do use correct terms for AD actions (i.e., AD NPRM
_____ or Final Rule AD)

Follow-up Responses

Review background and NTSB responses
Review milestones
Provide status of milestones
Give full explanation if position changes (why and how it still
addresses recommendation)

Subject: INFORMATION: National
Transportation Safety Board (NTSB)
Recommendations _____;
Your Memo Dated _____

From: Manager, Appropriate Division or Directorate

To: Director, Office of Accident
Investigation, AAI-1
Thru: Deputy Director, Aircraft
Certification Service, AIR-2
Manager, Technical Programs and Continued
Airworthiness Branch, AIR-120

NTSB Recommendations _____ (#'s) were issued on
_____ (date). The subject memorandum assigned Recommendations
_____ (#'s) to the _____ (action office).

Attached are the responses for these recommendations. Actions are considered
complete on all recommendations (or on Recommendations _____ (#'s)).
We will provide an update on Recommendations _____ (#'s) by
_____ (date).

In the preparation of this response the following offices were consulted:
_____ (name), _____ (routing symbol), _____ (telephone).

Should you have any questions, please contact _____ (name) at _____ (phone
#) _____.

Signee's Name

Attachment(s)

Aircraft Certification Response: Type response following guidelines given in checklist.

